

Tab 2
(PART TWO)

1 A. Maybe three, four weeks later.

2 Q. So you go three or four weeks without
3 even seeing him?

4 A. Ah-huh.

5 Q. This takes us into at a minimum late
6 February. So you didn't see him at all in
7 February basically?

8 A. Ah-huh.

9 Q. Valentine's Day comes and goes in
10 February of 2003, you don't hear from him, you
11 don't see him?

12 A. No.

13 Q. At any time between the end of January
14 2003 -- at any time after the hug that you just
15 described, did you and Larry exchange any other
16 hugs?

17 A. No.

18 Q. The hug that you described in January,
19 February, was that the last hug you and Larry
20 have ever exchanged?

21 A. No.

22 Q. Well, nothing happened in February.
23 You hardly ever saw him in February 2003;
24 right?

25 A. Ah-huh.

1 Q. When was the next hug?

2 A. I'm going to say maybe the end of
3 February, beginning of March. I was at another
4 restroom clear over by MIS area. I was in
5 there cleaning and he hollered in at me; and I
6 asked him what he wanted and he goes, I just
7 want to talk to you. He started talking to me
8 and asking me about how I was doing, I haven't
9 seen you for a while, and wanting to know how
10 everything was going and how my days were
11 going; and he was telling me about his son's
12 birthday coming up, his son that had passed
13 away, his son's birthday coming up and he was
14 upset about that. We just got into talking
15 about the death of his son, how he dealt with
16 his birthday and everything; and he came up --
17 he kept getting closer and closer to me and I
18 kept backing up; and then he finally got close
19 enough to me that he told me that he needed a
20 hug and, dummy me, I agreed to it; and that
21 time he tried hugging me, he tried kissing me
22 that time.

23 Q. Was the hug the same as the hugs
24 previous to the one that you said occurred in
25 late January?

1 A. Yes.

2 Q. It was more just a friendly --

3 A. Yeah, just a friendly --

4 Q. I'll call it a platonic hug. And all
5 the others were friendly, platonic hugs;
6 correct?

7 A. Yeah.

8 Q. Were your positionings exactly the same
9 with this hug that you're now describing as it
10 was back then, your arms over his shoulders and
11 around his neck and his arms around your waist,
12 both arms around your waist?

13 A. Ah-huh.

14 Q. What else happened?

15 Were all those "ah-huhs" yeses?

16 A. Yeses. Sorry.

17 When I tried backing up --

18 Q. You were finished with the hug?

19 A. Right. He wasn't and he kept ahold of
20 me and he turned his head toward mine and tried
21 to kiss me.

22 Q. Where did he try to kiss you?

23 A. On my lips.

24 Q. Where were you facing at that time?

25 A. I was facing forward --

1 Q. And the two of you --

2 A. -- because I was trying to back up.

3 Q. Where were your arms?

4 A. Trying to back up off of him.

5 Q. Okay. Then what happened?

6 A. When he tried that, I pushed him, the
7 front of his shoulders and pushed him.

8 Q. How do you know he was trying to kiss
9 you?

10 A. He just was. I could just tell that
11 his head -- it was so close to me that I could
12 feel his lips right at the corner of my lips.

13 Q. But you were pushing away?

14 A. Before I was trying to push away.
15 Right before I went to release off of his
16 shoulders.

17 Q. Did his lips touch your lips?

18 A. The corner of my lips.

19 Q. What did you say?

20 A. "Why do you continually do this stuff?"

21 Q. What did you mean "this stuff"?

22 A. The touching of my butt, trying to kiss
23 me.

24 Q. I just want to make sure I'm clear
25 here.

1 A. Okay.

2 Q. He touched your butt once?

3 A. Yes.

4 Q. This was the first time he attempted to
5 kiss you?

6 A. Yes.

7 Q. Okay. Those were the only two things
8 you were talking about?

9 A. Yes.

10 Q. What did he say?

11 A. "I don't know why."

12 Q. Did he say, I want to kiss you?

13 A. No.

14 Q. Did he ask you if he could kiss you?

15 A. No.

16 Q. If he had asked if he could kiss you,
17 what would you have said?

18 A. No.

19 Q. What else did you say to him?

20 A. I told him to leave.

21 Q. And did he?

22 A. Yes.

23 Q. And you're clear in your recollection
24 that this happened end of February, beginning
25 of March 2003?

1 A. It's in that time frame somewhere.

2 Q. In what time frame? Do you mean end of
3 February, early March?

4 A. It could be like the end of March,
5 early February. Like the last two weeks of
6 February, first two weeks of March.

7 Q. Okay. So it was definitely that time
8 frame?

9 A. That time frame.

10 Q. And he left the restroom at that time?

11 A. Yes.

12 Q. Did you report that to anyone at HR?

13 A. No.

14 Q. Did you report that to your supervisor?

15 A. No.

16 Q. Did you tell Cornelia?

17 A. No.

18 Q. Did you tell your husband?

19 A. No.

20 Q. Did you tell anybody?

21 A. No.

22 Q. What happened next? We're in March of
23 2003. Anything happen in March of 2003?

24 A. No, because I kept ignoring him. I
25 wouldn't talk to him.

1 A. Yes; and you get your picture taken
2 with your car. You get put in the paper. It's
3 just a neat little thing for the guys that
4 race.

5 Q. So what dates did you say the cars were
6 displayed?

7 A. It was the first weekend of March. It
8 was Thursday, Friday, Saturday and Sunday. I
9 can't remember if it's the 2nd, 3rd, 4th, 5th
10 or it's the 6th, 7th, 8th, 9th, something like
11 that

12 Q. All of the days, the Thursday, Friday,
13 Saturday and Sunday, were all in March?

14 A. Yes.

15 Q. It didn't tail off February?

16 A. No.

17 Q. In March?

18 A. Yes, it was in March.

19 Q. What happened?

20 A. Okay. Let's see. Jonathan and Harold
21 and I were all out there Friday night having a
22 good time with some friends, went and ate; and
23 then Saturday we went back out because Jonathan
24 was getting his picture taken.

25 Q. Went back out to the mall?

1 A. Yeah, went back out to the mall; and
2 then the guys decided Sunday they were going to
3 leave a little early because you have to wait
4 till the mall closes on Friday to get your cars
5 and carts out of there.

6 Q. On Friday?

7 A. I mean on Sunday. Sorry, Sunday. And
8 so they left approximately between 4 and 4:30
9 to be out there.

10 Q. They left home?

11 A. Yes, they left home. It takes them 20,
12 25 minutes to get there from our home.

13 In that time that they went to do that,
14 I went to Shop N'Save to pick up some
15 groceries.

16 Q. How far is Shop N'Save from your house?

17 A. Eight minutes, a real short distance.

18 I come home, it was probably around
19 5:00. I come home and I'm putting the
20 groceries in the house, taking them from the
21 car into the house; and a car pulls up; and
22 it's dark out so I had no clue who it was
23 because I never seen the car before; and so I'm
24 carrying these groceries in, set them down on
25 the floor, walked back out; and Larry Meade

1 gets out of the car. I said, what are you
2 doing here? He goes, I need to talk to you.
3 Talk to me about what? He goes, I need to talk
4 to you. And I'm standing there shivering
5 because it's cold out and it's starting to
6 rain. I had the last of my groceries in my
7 hand. He goes, let's just step inside, get out
8 of this cold. So we stepped right inside my
9 door and he shut the door behind him.

10 Q. The front door to the house?

11 A. The front door to the house. I said,
12 what do you want? I can't exactly remember
13 everything word for word for word that he said,
14 but I can basically remember most of it. He
15 started to tell me that he was madly in love
16 with me, he wanted to marry me, that we could
17 go off to Florida and have a wonderful time
18 together, that I didn't need my husband and
19 son, that he could take care of me, that he had
20 lots of money.

21 He asked me at that time -- because I
22 was dumbfounded -- I just stood there. I
23 didn't say anything. I didn't know what to
24 say. I didn't know what to think. He said, I
25 know you are here by yourself and you will be

1 here by yourself for a while. And I asked him,
2 how do you know that? He said, I just seen
3 your husband and son out at the Cranberry Mall
4 getting your son's go-cart. I said, you did?
5 He said, yeah, they're busy, they won't be home
6 for a while.

7 Then he proceeded to tell me, he says,
8 I wanted to tell you how good you looked last
9 night. I said, how did you even see me or
10 where were you? He says, you were out at the
11 mall with Harold and Jonathan. You had on
12 black jeans, a black leather jacket, black
13 boots, a teal turtle neck. He described
14 everything I had on to a T.

15 Q. And he was correct?

16 A. He was correct.

17 He's standing there. I don't have my
18 coat off. I'm just standing there thinking,
19 what is going to happen next? I told him, I
20 said, Larry, you are playing with fire here and
21 you're not just playing with a little fire,
22 you're playing with a big, burning bush fire.

23 Q. What did you mean by that?

24 A. That it wasn't something little he was
25 dealing with here, that he was pushing the

1 wrong buttons.

2 Q. I still don't understand what you mean.

3 A. That he was going overboard with
4 everything, that this just could not -- this
5 was something that -- it couldn't be.

6 Q. Do you mean the two of you together?

7 A. Yes. Yes. And he just kept repeating
8 about he knows that Harold and Jonathan are out
9 at the mall, that they won't be home for a
10 while; and he said that we're alone here, they
11 won't be home for a while, we could easily have
12 sex right now; and I told him, no, we are not
13 going to. I said, I love my husband very, very
14 much. I would do nothing to jeopardize my
15 marriage to him. I love my son very much. I
16 already lost one son, I'm not going to lose
17 another; and told him that -- I said, right now
18 you're not speaking clearly with your head,
19 you're speaking out the end of your dick and if
20 you would right now leave, get out that door
21 and leave.

22 Q. And did he?

23 A. Yes. When he turned around, he yelled
24 something about, the next time you see me it
25 will be at Morrison's Funeral Home; and he

1 slammed the door. He got into his car and I
2 could hear the wheels squealing.

3 Now, this is after the bathroom
4 incidents. So I'm pretty sure now the bathroom
5 incidents were all in February.

6 Q. The bathroom incidents were all in
7 February, the two?

8 A. Yes.

9 Q. Both the hug touching the top of your
10 butt --

11 A. Yeah.

12 Q. -- and the attempted kiss, it's your
13 testimony that they occurred in February of
14 2003?

15 A. Yes.

16 Q. You're certain of that?

17 A. If I could look at my diary, I could
18 tell you for certain because I wrote down the
19 exact time frame.

20 Q. I need your recollection.

21 A. I'm thinking the end of January,
22 beginning of February the first one. The end
23 of February the second one.

24 Q. When he is in the house with you, where
25 are the two of you standing?

1 A. He is standing near the doorway to go
2 out the front door and I'm further into the
3 house into the dining room area.

4 Q. Does the front door open to a foyer --

5 A. Yes.

6 Q. -- or does it open right into the
7 dining room?

8 A. No, opens to a foyer.

9 Q. When you first walk in the door, if you
10 were to walk straight, where would you go?

11 A. Up a pair of stairs.

12 Q. To the second floor?

13 A. Ah-huh.

14 Q. How many steps are there?

15 A. Twelve, 13.

16 Q. When you walk in the front door, is it
17 open to the left?

18 A. Yes.

19 Q. Is it also open to the right?

20 A. No.

21 Q. There's a wall there?

22 A. Yes.

23 Q. Is that the outside wall of the house?

24 A. No.

25 Q. What is that wall?

1 A. That wall goes to a closet and a
2 bedroom.

3 Q. On the other side of the wall?

4 A. Yes.

5 Q. That you get to by going through the
6 house to the left through the dining room?

7 A. Yeah.

8 Q. And he is standing in that foyer area?

9 A. Yeah.

10 Q. What way is he facing?

11 A. Forward. Like you walk in the door and
12 you like step to the right and you stand there.

13 Q. Okay. And where are you in the dining
14 room?

15 A. In the dining room facing the door.

16 Q. Facing the outside door?

17 A. Yes.

18 Q. Facing Larry.

19 What is Larry wearing?

20 A. Jeans, tennis shoes, a jacket. That's
21 all I can remember.

22 Q. A hat?

23 A. I don't remember a hat.

24 Q. How far apart are you?

25 A. I'm going to say maybe 13 feet.

1 Q. So at no time is he touching you?

2 A. No.

3 Q. How long does this exchange take place?

4 A. To me it felt like forever, but I know
5 it wasn't. Five to ten minutes. Maybe not
6 even that.

7 Q. Was it your testimony it takes 20 to 25
8 minutes to get from the Cranberry Mall to your
9 house?

10 A. Ah-huh.

11 Q. Was there any snow on the ground that
12 day?

13 A. No. It was raining.

14 Q. Was it cold enough for the roads to get
15 icy?

16 A. No.

17 Q. What time was Larry there?

18 A. I'm going to say around 5:00.

19 Q. After Larry left, what did you do?

20 A. I paced the floor and just kept
21 thinking and thinking and thinking, what do I
22 do now, what do I do now?

23 Q. What were you thinking about?

24 A. I just kept thinking, what's he going
25 to do next? Could he come back here? How am I

1 A. Ah-huh.

2 Q. You were testifying that you asked Mr.
3 Wakefield basically what happened at the mall
4 with the picking up of the go-cart. What
5 happened then?

6 A. We basically just got things ready for
7 Jonathan for school the next day and made sure
8 he had everything ready to go and watched a
9 movie I think on TV or the news. We got some
10 showers and went to bed.

11 Q. Were you scheduled to work the next
12 day?

13 A. Yes.

14 Q. Did you go to work the next day?

15 A. Yes.

16 Q. What time did you start your shift?

17 A. Seven.

18 Q. You went to work?

19 A. Yes.

20 Q. Did you see Larry Meade at work that
21 day?

22 A. No.

23 Q. What happened at the end of the day?

24 A. I went to see Susan Stewart.

25 Q. Did you have a scheduled appointment

1 maybe I did, but I didn't come up with any
2 correct answer to convince myself that I did do
3 anything.

4 Q. Did you question the fact that you had
5 voluntarily allowed him to hug you all those
6 times?

7 A. Yeah.

8 Q. During that time period, was there
9 anyone else in the office you were hugging?

10 A. Cornelia would give me hugs. Diane
11 would give me hugs. Mike Calderone did because
12 he had a son that died, also. He knew what I
13 was going through. Just various people would.

14 Q. And is it fair to say that you hugged
15 Larry more frequently than anyone else at the
16 office?

17 A. Yeah.

18 Q. What happened when you went home after
19 your session with Susan Stewart?

20 A. We had supper and Jonathan was out in
21 the garage and I told Harold that I had
22 something really important that I needed to
23 talk to him about; and he said okay; and I told
24 him about Larry Meade coming to the house, what
25 he said and everything; and, of course, he

1 bed that night?

2 A. Yes.

3 Q. What happened the next day?

4 A. We both went to work. We come home
5 from work and I asked Harold if it would be a
6 good idea if I called my brother.

7 Q. Who is your brother?

8 A. Vincent White.

9 Q. Why did you think it would be a good
10 idea to call your brother?

11 A. He's a State Police officer.

12 Q. What did Harold say?

13 A. "If you want to, go ahead."

14 Q. Did you?

15 A. Yes.

16 Q. What did your brother say?

17 A. My brother said that he's dealt with
18 different things like that and it comes down to
19 -- since there was no witnesses, he said it's
20 really hard, it's extremely tough, that it's a
21 she said/he said type situation, that I could
22 -- since there was no harm done physically, he
23 said that mainly there was nothing the police
24 could really do.

25 Q. Was that the extent of your

1 conversation with your brother?

2 A. Yeah.

3 Q. Did you ever discuss the question of --
4 was the purpose of talking to your brother the
5 thought that you might press criminal charges
6 against Larry for having been at your house
7 that Sunday night?

8 A. Yes.

9 Q. When you were at work the next day, did
10 you tell anybody what happened? When you were
11 at work on Monday or Tuesday, did you tell
12 anybody what happened at your house on Sunday?

13 A. No.

14 Q. Did you tell anybody from HR?

15 A. No.

16 Q. Did you tell your supervisor?

17 A. No.

18 Q. Did you tell Larry's supervisor?

19 A. No.

20 Q. Had you ever told Larry's supervisor
21 anything that had happened with Larry?

22 A. No.

23 Q. After you spoke with your brother, did
24 you share what your brother's thoughts were
25 with Harold?

1 a little bit bigger, curly blondish/brown hair,
2 real pleasant person.

3 Q. So if we look at your time card pay
4 records from that week, we'll be able to tell
5 what day you went to get the PFA because that
6 was the day that you didn't go to work?

7 A. Ah-huh.

8 Q. Yes?

9 A. Yeah.

10 Q. Okay. What else did you do that day
11 that you didn't go to work?

12 A. I stayed at the house and moped around.

13 Q. You're relatively certain you didn't
14 take Friday off; correct?

15 A. I don't know. It could be.

16 Q. So the week came and went. Did you
17 tell anybody at HR what had happened that week?

18 A. No.

19 Q. Did you tell your supervisor that week
20 what had happened?

21 A. No.

22 Q. Did you tell anybody at Joy that week
23 what had happened?

24 A. No.

25 Q. Did you work overtime that weekend?

1 A. No.

2 Q. What happened the next Monday?

3 A. I'm pretty sure I went to work and came
4 home.

5 Q. Did you tell anybody at Joy that day
6 about what happened?

7 A. No.

8 Q. At that point, the Monday following --
9 we'll say now eight days after Larry had been
10 to your home, were you aware that Joy had a
11 sexual harassment policy?

12 A. Yes.

13 Q. If you were to have told anyone about
14 what had happened with Larry, who would you
15 have gone to?

16 MR. LINDSAY: I don't mean to --
17 just a question on the form of the question.
18 Do you mean who she would have gone to if she
19 was following the policy? Is that what you
20 mean?

21 MS. COCHENOUR: No. I just want
22 to know --

23 MR. LINDSAY: Personally?

24 MS. COCHENOUR: No. No.

25 Q. You knew Joy had a sexual harassment

1 MR. LINDSAY: I just want to
2 object to the form of the question because
3 that's such a broad term and I'm concerned that
4 we'll get an answer that may not be responsive
5 to what you want because -- comfortable about
6 reporting it, comfortable about being with him
7 in a restroom or whatever.

8 MS. COCHENOUR: I'll ask it
9 again.

10 Q. Would you have been comfortable
11 reporting Larry Meade's behavior to Wayne
12 Hilliard?

13 A. No.

14 Q. Do you know who Larry Meade's
15 supervisor was?

16 A. No.

17 Q. You would have been comfortable then,
18 your testimony is, to report Larry's behavior
19 to Diane Kemick who is in HR; correct?

20 A. Yes.

21 Q. Or to Cornelia --

22 A. Yes.

23 Q. -- Adams who is in HR?

24 A. Ah-huh.

25 Q. And at least as of eight days following

1 the day that Larry came to your house, you
2 hadn't spoken with either one of them about
3 those incidents; correct?

4 A. Yes.

5 Q. And you hadn't spoken with Diane or
6 Cornelia about any concerns you had relating to
7 Larry Meade?

8 A. No.

9 Q. Before we took the break, Mrs.
10 Wakefield, you referred to a diary that you
11 kept. Can you tell me what the diary is, how
12 you kept it and when you started keeping it?

13 A. When I had talked to my brother, he
14 suggested that I start writing this stuff down
15 because he said it's very, very beneficial if
16 you ever need it to log it as you think of it.
17 He said, you may need information later, he
18 says, you may not, he says, but if you don't
19 write it down, it's not there. He said people
20 tend to forget things so easily.

21 Q. So I'm clear, you spoke with your
22 brother Vincent on March the 4th?

23 A. Yes.

24 Q. So March the 4th, 2003 is when you
25 first began keeping what you call your diary;

1 am I right?

2 A. Yes.

3 Q. I will represent to you that two
4 documents were produced to me in this lawsuit
5 by your lawyers, both of which are in
6 handwriting. One is short. One is very long.

7 Did you keep two diaries?

8 A. Yes.

9 Q. When you're talking about the diary
10 that you began keeping when you spoke with your
11 brother Vincent on March 4th, are we talking
12 about the shorter document or the longer
13 document?

14 A. The shorter.

15 Q. I'm going to show you a copy of a
16 document. I'm going to ask that it be marked
17 as Exhibit 1 in your deposition.

18 (Deposition Exhibit No. 1 was
19 marked for identification.)

20 Q. Do you recognize this document?

21 A. Yes.

22 Q. Is this your handwriting?

23 A. Yep.

24 Q. Is this your handwriting on all seven
25 pages of the document?

1 A. Yes.

2 Q. Is this the document that you were just
3 referring to?

4 A. Yes.

5 Q. This is a document that you prepared
6 after you spoke with your brother on March 4th,
7 2003; correct?

8 A. Yes.

9 Q. So is it fair to say that everything in
10 this document was prepared from your memory?

11 A. Yes.

12 Q. This document was not prepared on a
13 daily basis contemporaneous with the events
14 that are recorded?

15 A. No.

16 Q. When did you prepare the document?

17 A. If I thought of something, I wrote
18 something down.

19 Q. When did you begin preparing this
20 document?

21 A. I can't exactly say the exact date.

22 Q. Was it in March of 2003?

23 A. It was around that time frame.

24 Q. So sometime in March of 2003 you began
25 preparing the document we have marked as

1 Exhibit 1; correct?

2 A. Yeah.

3 Q. And this document was prepared all from
4 your memory --

5 A. Yes.

6 Q. -- and your best recollection of past
7 events?

8 A. Yes.

9 Q. Look at the first page in about the
10 third paragraph down. About halfway down the
11 page there's a sentence that begins "When I
12 would be cleaning men's restroom" --

13 I'm going to reach over and point to it
14 for you because it's kind of hard to see. Is
15 that okay?

16 A. Yeah, because I can't find it.

17 Q. Okay. And I'm going to take it from
18 you for just a second because it's kind of hard
19 to read upside down.

20 Start right here (indicating.)

21 A. Oh, okay.

22 Q. I'm going to read a portion of this and
23 my first question to you will be whether I read
24 it correctly; okay? This is your handwriting?

25 A. Yeah.

1 Q. "When I would be cleaning men's
2 restrooms he would bypass the Do Not Enter sign
3 to talk to me. Ask me how I was and how my
4 husband and my son were. He would make just
5 casual conversation. I felt comfortable with
6 talking about the death with him due to the
7 fact that he had the same experience with his
8 son. He would often give me a hug when I was
9 feeling depressed and sad. He always seemed to
10 know when I was having a bad day."

11 First of all, did I read that
12 correctly?

13 A. Yes.

14 Q. I'm going to go back and read the first
15 sentence right before that; okay? Please tell
16 me if I read that correctly.

17 "Went back to work two weeks after the
18 funeral to keep busy."

19 Did I read that correctly?

20 A. Yes.

21 Q. So is it fair to say that this document
22 indicates that within the first two weeks that
23 you came back to work after the funeral in
24 April of 2002 Larry was coming into the
25 restroom and was giving you hugs?

1 A. Yes.

2 Q. With your permission?

3 A. Yes.

4 Q. I'm going to read a little further.

5 "One day in June 2002 he came to see how I was
6 doing, gave me a hug and tried to kiss me."

7 Did I read that correctly?

8 A. Yes.

9 Q. Larry Meade only ever tried to kiss you
10 once; correct?

11 A. Yes.

12 Q. Okay. Is this document correct that he
13 tried to kiss you in June 2002?

14 A. Yes.

15 Q. So your testimony earlier today that he
16 tried to kiss you in February or March of 2003
17 is incorrect?

18 A. Correct.

19 Q. Okay. This document is correct?

20 A. This one is correct.

21 Q. Your testimony earlier today is
22 incorrect?

23 A. Incorrect.

24 Q. Okay. A little further down in that
25 same paragraph -- again I'm going to reach over

1 and show you where I'm reading because it's
2 hard to follow. Right there (indicating).

3 A. Okay.

4 Q. "He then would let 2-3 days pass until
5 he would talk to me again. I would say 3 weeks
6 went by and he came to me and said it was his
7 son's birthday and he felt sad and he needed a
8 hug. I gave him a hug and his hands started
9 roaming and grabbed my butt."

10 Is that the same incident that we
11 talked about earlier today in your testimony?

12 A. Yes.

13 Q. And he only touched your butt once;
14 correct?

15 A. Yes.

16 Q. And this indicates -- meaning in
17 Exhibit 1 -- that that occurred about three
18 weeks after the attempted kiss; am I right?

19 A. Yes.

20 Q. So it would have happened in late June
21 or early July of 2002; correct?

22 A. Yes.

23 Q. So is this document correct?

24 A. This is correct.

25 Q. So that your testimony earlier today

1 that the hug that resulted in Larry's hands
2 touching the top of your butt did not occur in
3 February or March of 2003?

4 A. No.

5 Q. It did not occur in January of 2003?

6 A. No.

7 Q. Correct?

8 A. This is the correct --

9 Q. It happened in late June --

10 A. Yes.

11 Q. -- or early July of 2002?

12 A. Yes.

13 Q. Okay. Your testimony earlier today
14 about Larry making comments about how pretty
15 you looked and about asking you about what kind
16 of underwear you wore and him saying that you
17 would look good in a bikini, did all of that
18 occur in the late summer, early fall of 2002?

19 A. Repeat that.

20 Q. You testified earlier today that at
21 some point Mr. Meade would ask you about what
22 kind of underwear you wore, that he would tell
23 you you looked pretty and that he told you you
24 would look nice in a bikini on his boat. All
25 of those things occurred in late summer, early

1 Q. Why not?

2 A. Because I felt that he would accuse me
3 of having an affair like his ex-wives did and
4 he was already going through so much stuff with
5 the death of his son, I didn't want anything
6 else piled on top of that.

7 Q. So the reason --

8 A. And I felt that I could handle myself.
9 I just felt that -- I don't know. I just felt
10 that it would all go away.

11 Q. So the reason your husband didn't know
12 about the attempted kiss and the hug with
13 Larry's hands on the top of your butt is
14 because you didn't tell him?

15 A. Right.

16 Q. Did you tell your counselor about those
17 two incidents?

18 A. When?

19 Q. At or before the counseling session
20 when you told Susan Stewart about Larry Meade
21 having come to your house that Sunday.

22 A. No.

23 Q. Why didn't you tell the counselor?

24 A. I felt ashamed. I felt embarrassed. I
25 felt that from day one I should have never,

1 A. That he said about Morrison's Funeral
2 Home and that Larry said that he didn't think
3 that would really bother me that much
4 mentioning Morrison Funeral Home.

5 Q. A couple of lines down, the sentence
6 begins, "On June 3rd at work." Do you see
7 that?

8 A. Yes.

9 Q. I'm going to read from the Exhibit.

10 "On June 3rd at work I went in to clean
11 a men's restroom. I had severe flashbacks of
12 him being in that restroom. I couldn't handle
13 it and I had an emotional breakdown."

14 Did I read that correctly?

15 A. Yes.

16 Q. There is a gap in time, wouldn't you
17 say, between your recording of events here?
18 Right before the paragraph that starts "On June
19 3rd," you were writing about what was happening
20 in early March; correct?

21 A. Ah-huh.

22 Q. Did anything happen between March and
23 June that is not reflected in this document?

24 A. No.

25 Q. Did you have any meetings with anyone

1 really well, and I apologize.

2 Did Harold schedule the meeting?

3 A. I can't remember if he did or if I did.

4 Q. Did you and Harold discuss the fact
5 that a meeting should be scheduled with HR --

6 A. Yes.

7 MR. LINDSAY: Please let her
8 finish the question before you answer.

9 Q. I'll ask it again. Did you and Harold
10 decide together that a meeting should be
11 scheduled with HR to discuss Larry Meade?

12 A. Yes.

13 Q. Did you agree with that plan?

14 A. Yes.

15 Q. When did you and Harold come up with
16 that plan?

17 A. I don't remember.

18 Q. It was clearly after Larry Meade came
19 to your home that Sunday?

20 A. Yes.

21 Q. Was it during the week following that
22 visit?

23 A. Yes.

24 Q. Was it after your discussion with your
25 brother?

1 A. Yes.

2 Q. What is it?

3 A. It's my journal, as you would call it.

4 Q. I'm not giving it a name. Do you call
5 it a journal?

6 A. Yeah.

7 Q. Can we call this your journal then as
8 we're talking today?

9 A. Yes.

10 Q. How do you keep this journal?

11 A. I write stuff down.

12 Q. Do you write stuff down every day?

13 A. Not every day, no.

14 Q. When did you start keeping this
15 journal?

16 A. Whenever the first date starts on it.
17 I can't remember when I started it.

18 Q. As I look at this document, the first
19 date I see is April 9th, 2002; correct?

20 A. Correct.

21 Q. Are there any entries in this journal
22 that predate April 9th, 2002, or is this the
23 very first page of this journal?

24 A. I don't know. I could have jumped
25 around.

1 A. No.

2 Q. Have you always had a habit of
3 maintaining a journal?

4 A. No.

5 Q. When did you start maintaining the
6 journal that is represented by Exhibit 2?

7 A. Whenever the first date of it is on
8 there.

9 Q. Okay. It's your testimony that you
10 began keeping the journal that is represented
11 by Exhibit 2 on April 9th, 2002?

12 A. I don't know because I could have
13 jumped back and put stuff in there. Say it was
14 September of 2002 and I could have jumped back
15 and documented stuff that had previously
16 happened.

17 Q. So as I look through this document and
18 I see an entry for April 9th, 2002, I should
19 not presume that what is written here was
20 written on April 9th, 2002; correct?

21 A. No.

22 Q. I should not make that assumption?

23 A. Not on this one, on this certain paper
24 right here (indicating).

25 Q. Are there any entries in this document,

1 in Exhibit 2, where, for example, I could look
2 and see November 23rd, 2003 -- on any of them
3 can I presume that the entry was made on that
4 date, or are all of the entries made from
5 memory on another date?

6 A. The latter part of it is day to day.
7 The beginning of it could be prior.

8 Q. Would you mind taking a minute, looking
9 through it page by page and tell me where you
10 started the day-by-day entries?

11 A. Right here (indicating).

12 Q. Is it easy for you to tell me a date?

13 A. It's the paper that says December 19,
14 2002.

15 Q. I hate to do this to you. Can you
16 count the number of pages back? It might be
17 the easiest way for us.

18 Am I at the right page?

19 A. Yeah.

20 Q. So 17 pages back in an entry that
21 states "Harold, Jonathan and I left for Florida
22 on December 19th, 2002. We flew out of
23 Pittsburgh to Tampa, Florida to meet Harold's
24 brother. We stayed until December 30th, came
25 home in the evening." That's the entry that

1 your testimony is starts your day-to-day
2 entries?

3 A. Yes.

4 Q. I'm confused. Can you tell me what
5 date you made the entry that I just read?

6 A. December 30th.

7 Q. So you came home from vacation, arrived
8 home in the evening of December 30th and you
9 wrote the entry that I just read?

10 A. Yes.

11 Q. The next page says January 6th of 2003;
12 correct?

13 A. Yes.

14 Q. Can I presume that the entry written
15 here was made on January 6th --

16 A. Yeah.

17 Q. -- of 2003?

18 MR. LINDSAY: Let her finish the
19 question before you answer, please.

20 Q. My question was, can I presume that the
21 entry marked January 6th of 2003 was written by
22 you on January 6th, 2003?

23 A. No.

24 Q. No, I cannot presume that?

25 A. No.

1 Q. Show me where in this document I can
2 start presuming daily entries. It is not where
3 you thought it was; is it?

4 A. No.

5 Q. Okay. I want to alert you, too, as
6 you're looking through the document, Mrs.
7 Wakefield, that some of these pages have
8 two-sided copies and that's how they were
9 provided to me; okay?

10 A. I think that's where I'm getting goofed
11 up.

12 On this one (indicating). On a day to
13 day to day?

14 Q. Well, it doesn't matter if you hit
15 every day. What I'm interested in knowing is,
16 is there a point in this document where you
17 start making entries on the same date that is
18 shown on the document? In other words, you're
19 making entries contemporaneous with the same
20 day, you're not writing from memory.

21 A. Okay. It must be this one. Yeah, this
22 one (indicating).

23 Q. Okay. What is the date of that entry?

24 A. February 26, 2003.

25 Q. February 26th, 2003?

1 A. Yeah.

2 Q. So is it fair to say, Mrs. Wakefield,
3 that on all of the pages that precede the entry
4 that begins February 26th, 2003 and the
5 information contained in those entries were
6 recreated from memory?

7 A. Correct.

8 Q. Okay. And beginning February 26th,
9 2003 you started a daily compilation?

10 A. Correct.

11 Q. When did you prepare the information
12 contained in all of the pages preceding the
13 entry dated February 26th, 2003?

14 A. Sometime in 2002. I don't know the
15 exact date. I just started jotting things down
16 as I remembered them.

17 Q. So sometime in 2002 you began this
18 composition book?

19 A. Yes.

20 Q. And you started the composition book by
21 writing things down from memory?

22 A. Correct.

23 Q. You weren't writing them down on the
24 days that they happened; correct?

25 A. Correct.

1 Q. You didn't start writing things down in
2 this journal on the days that they happened
3 until the entries beginning February 26th,
4 2003; correct?

5 A. Repeat that again.

6 Q. For all of the entries that are
7 contained in this Exhibit before February 26th,
8 2003, all those entries were prepared from
9 memory; right?

10 A. No.

11 Q. When were they prepared?

12 A. Some were on the exact dates and some
13 weren't.

14 Q. How, as I read through this document,
15 do I know what entries were made on the exact
16 date and which ones weren't?

17 A. You don't.

18 Q. The only way I would know is if I went
19 through each one with you?

20 A. Correct.

21 Q. Would you remember?

22 A. I don't know if I would or not.

23 Q. Why did you start this document?

24 A. So that I could remember things. I
25 felt that I needed it.

1 Q. Why?

2 A. I just did.

3 Q. Did you start this document at about
4 the same time you started the document that we
5 identified as Exhibit 1?

6 A. No.

7 Q. Did you start this document before or
8 after you spoke with your brother in March of
9 2003?

10 A. I think it was after.

11 Q. Okay. So as we look at the entry
12 February 26 of 2003, you did not write this
13 entry on that date; correct?

14 A. Which one?

15 Q. February 26th, 2003.

16 A. Yes, this one is correct.

17 Q. Well, you hadn't spoken to your brother
18 yet; correct? You spoke to your brother in
19 March of 2003, that was your testimony, after
20 Larry Meade came to your house that Sunday; is
21 that correct?

22 A. No, I didn't write this this day.

23 Q. So the testimony that you gave just a
24 few moments ago that you began journal entries
25 on February 26th, 2003 is incorrect?

1 A. Correct.

2 Q. You began this journal then sometime
3 after you spoke to your brother Vince in March
4 2003?

5 A. Correct.

6 Q. None of these entries were written
7 before you spoke with your brother Vince;
8 correct?

9 A. Correct.

10 Q. Did you ever refer to this document as
11 "the book"?

12 A. Yeah.

13 Q. Harold was aware that you were
14 preparing this document?

15 A. Yes.

16 Q. Did you and Harold discuss the
17 preparation of this document?

18 A. Yes.

19 Q. What was the nature of your
20 discussions?

21 A. We talked about that if -- when you
22 remember things, write it down, try to put it
23 in perspective of the actual date and time of
24 when it was. Look at the calendar, see if
25 there's anything on there that triggers your

1 memory. He was basically just trying to help
2 me remember the time frames, dates; because the
3 calendar we have at home we would write down
4 doctors' appointments, if Jonathan was off
5 school sick; and that sort of helped me know
6 the time frames of different things that would
7 happen.

8 Q. Do you still have that calendar?

9 A. I have no idea.

10 Q. Do you know whether or not you gave
11 that calendar to your lawyer?

12 A. I don't know.

13 Q. Could you look for the calendar,
14 please?

15 A. Yeah.

16 Q. If you find it, will you provide it to
17 Mr. Lindsay?

18 A. Yes.

19 Q. If you think you've already provided it
20 to Mr. Lindsay or Ms. Sutton, would you please
21 alert Mr. Lindsay to that fact?

22 A. Yes.

23 Q. So as you sit here today, you can't
24 really tell me when you started writing this
25 document?

1 A. No.

2 Q. Was your intention that this document
3 would be used for the book?

4 A. At the time I started writing it, I had
5 no clue.

6 Q. On the right-hand side of many of the
7 pages that -- the early pages of this document,
8 do you see the numbers 4-02, 5-02, 6-02? Is
9 that your handwriting?

10 A. Yes.

11 Q. Are those Post-its that are attached to
12 the original document?

13 A. Yes.

14 Q. Did you put those Post-its on there?

15 A. Yes.

16 Q. For what purpose?

17 A. So that if I wanted to look up
18 something that I could just go -- instead of
19 going through every single page, I could just
20 go to say August and flip up.

21 Q. So these Post-its note the month and
22 year of the entries --

23 A. Yes.

24 Q. -- that follow?

25 A. Yes.

1 Q. No. You don't have to read it out
2 loud, just to yourself.

3 A. Oh, to myself. Okay.

4 Q. Just to make it go a little more
5 quickly.

6 A. Okay.

7 Q. You've finished reading it?

8 A. Yeah, I'm done.

9 Q. Reading this page, does that further
10 confirm for you that the incident in which you
11 say Larry Meade hugged you in the men's room
12 and his hands touched the top of your butt
13 occurred in June of 2002?

14 A. Correct.

15 Q. Okay. I have to count here. Please
16 flip two more pages. At the top of the page it
17 begins "Can't remember if this happened late
18 June or early July."

19 Are you on the same page with me?

20 A. Yes.

21 Q. Could you just read the first paragraph
22 of that page and let me know when you're
23 finished?

24 A. Okay.

25 Q. Reading that entry, does that confirm

1 for you that the incident where Larry Meade
2 attempted to kiss you occurred in late June or
3 early July of 2002?

4 A. Correct.

5 Q. Would you please flip to five pages
6 after the one we were just looking at? The
7 page looks like this (indicating).

8 Are we on the same page?

9 A. No. I must have counted a little too
10 far. Okay, I have it.

11 Q. Do you have it? Do you see the
12 handwriting that begins a little bit before
13 halfway down the page. Is that your
14 handwriting?

15 A. No.

16 Q. Whose is it?

17 A. I don't know.

18 Q. Is that in the original?

19 A. Yes.

20 Q. Does anybody have access -- did anybody
21 have access to this composition book when you
22 were preparing it?

23 A. No.

24 Q. Did anyone have access to this
25 composition book after you prepared it?

1 February 26th, 2003; correct?

2 A. Yes.

3 Q. And then you wrote something about
4 February 28th, 2003; correct?

5 A. Yes.

6 Q. You didn't write anything about the
7 27th?

8 A. No.

9 Q. Do you have any idea when you made
10 these entries?

11 A. No.

12 Q. But we've at least established it was
13 sometime after March of 2003 --

14 A. Yes.

15 Q. -- when you spoke with your brother
16 Vince?

17 A. Yes. The only reason I know the exact
18 dates is because of the calendar because I
19 wrote down on the calendar, we have to take the
20 go-cart out to the mall, we have to pick the
21 go-cart up from the mall.

22 Q. Would you turn to the next page? At
23 the top it says "March 1st, 2003." Are we on
24 the same page together? Do you see there's a
25 gap in about the middle of the page? Is there

1 A. Yeah.

2 MR. LINDSAY: You're going back.

3 MS. COCHENOUR: Not really.

4 Moving forward.

5 Q. Do you see an entry for March 3rd,
6 2003? Would you turn to the next page, please?
7 It begins March 14th, 2003. Are there any
8 pages missing from the document that I have as
9 compared to the original from March 3rd, 2003
10 to March 14th, 2003?

11 A. No, not that I'm aware of.

12 Q. Is March 14th, 2003 the first time that
13 you made anyone at Joy aware of what was
14 happening with Larry Meade?

15 A. Yes.

16 Q. Did you and Harold have an appointment
17 to meet with someone in HR on March 14th, 2003?

18 A. No.

19 Q. Did you and Harold have an appointment
20 to meet with anyone at HR before March 14th,
21 2003?

22 A. I don't remember.

23 Q. Did you and Harold have an appointment
24 to meet with anyone at HR after March 14th of
25 2003?

1 she took me in the building; and she knew
2 everything about the death of Justin and
3 everything like that; and she went and got
4 Cornelia; and Johan took me into Johan's office
5 and had Cornelia talk to me for a little while;
6 and then when that was going on, they -- I
7 didn't realize what they were doing, but they
8 were calling Harold.

9 Q. Did Debbie leave when she brought you
10 to Johan's office?

11 A. Yes.

12 Q. Was Johan in his office?

13 A. I don't remember.

14 Q. You remember Cornelia being brought to
15 you?

16 A. Yes.

17 Q. Were you seated in a chair?

18 A. Yes.

19 Q. Where was Cornelia?

20 A. She was kneeling down in front of me.

21 Q. What did you tell Cornelia?

22 A. I tried telling her about what Larry
23 had done to me; and she couldn't understand
24 what I was saying.

25 Q. What do you mean you tried to tell